



Building Industry Association of Washington
300 Deschutes Way SW, Ste. 300
Tumwater, WA 98501
(360) 352-7800 | BIAW.com

October 13, 2022

State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Dear State Building Code Councilors,

The Building Industry Association of Washington (BIAW) gives a voice to 8,000 members that represent builders, remodelers, skilled trades professionals and their associates who help Washington families enjoy the American dream of owning a home. We are writing today to discuss concerns with the noted efficiency standards in the 2018 – and soon-to-be-adopted 2021 version – of the Washington State Residential Energy Code.

As you may know, our current residential and commercial energy codes (the 2018 WSEC-R and WSEC-C) specify certain equipment performance minimums in terms of their tested HSPF. Beginning next year, the HSPF is being replaced with HSPF2 to reflect a new testing method that better represents actual operating conditions. This creates a problem for determining compliance with the energy code since new equipment will only be listed with HSPF2, not an HSPF rating, that is currently in the 2018 code.

To address this problem, we would like you to support the proposed crosswalk submitted by WSU's Energy Program. This crosswalk is supported by many industry stakeholders and as such, we believe this will be a helpful tool in maintaining compliance with the energy code as the HSPF standard changes to HSPF2.

Sincerely,

Jan Himebaugh
Government Affairs Director
Building Industry Association of Washington